

# COHEN & GREEN

July 28, 2022

**BY ECF**

Hon. Colleen McMahon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *In Re: New York City Policing During Summer 2020 Demonstrations*,  
20-cv-8924 (CM)(GWG)  
This filing is related to: *Hernandez, et al. v. City of New York, et al.*,  
21-cv-7406 (CM)(GWG)

Your Honor:

I am co-counsel for Plaintiffs in *Hernandez, et al. v. City of New York, et al.*, which has been consolidated with *In Re: New York City Policing During Summer 2020 Demonstrations*, 20-cv-8924 (CM)(GWG) (the “Consolidated Action”) for discovery purposes.

On July 20, 2022 the *Hernandez* plaintiffs a Rule 68 offer from Defendants for the total sum of \$10,001.00 for plaintiff Krystin Hernandez, \$2,501 for plaintiff Natalie Baker, \$4,501 for plaintiff Ethan Chiel, \$2,501 for plaintiff Kyla Raskin, \$3,501 for plaintiff Rex Santus, \$3,501 for plaintiff Roxanne Zech, \$3,501 for plaintiff Rafael-Lev Gilbert, \$3,501 for plaintiff Sarah Mills-Dirlam, \$3,501 for plaintiff August Leinbach, \$4,501 for plaintiff Jalen Matney, \$3,501 for plaintiff Jonathan Davis, and \$4,001 for plaintiff David Holton, plus reasonable attorneys’ fees, expenses, and costs to the date of the offer – July 7, 2022 – for Plaintiffs’ federal claims. *See* Dkt No. 30.

On July 26, 2022, the Court entered judgment pursuant to Rule 68. *See* Dkt No. 32.

The deadline by which Plaintiffs must make an application to the Court to fix reasonable attorneys’ fees, expenses and costs will run on August 4, 2022.

Plaintiff now asks that the Court extend that deadline for a period of two months so that the parties can attempt to resolve the claim for attorneys’ fees, expenses, and costs without the need for a formal application to the Court. Defendants consent to this application.

Plaintiffs thank Your Honor for the Court’s attention to this matter.



Respectfully submitted,

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Elena L. Cohen